

Leslie Salt Co.
A CARGILL CO.

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October 9, 1989

OCT 11 1989

DCB

Mr. Dale Bowyer
Sanitary Engineer Associate
Regional Water Quality Control Board
1111 Jackson Street, Room 6000
Oakland, CA 94607

Dear Dale:

As we discussed, please find attached the draft September 18, 1989 meeting notes. Please review and make any corrections or additions. Please return with your comments so I can finalize.

Thanks for your help.

Sincerely,



Barbara N. Ransom
Environmental Affairs Manager

BNR/tb

Attachment

September 25, 1989

DRAFT

Meeting Notes

Results of Meeting with Regional Water Quality Control Board on Bittern Discharge Held on September 18, 1989

Participants:

Barbara Ransom, Leslie Salt Co.
Bob Douglass, Leslie Salt Co.
John Pyles, Leslie Salt Co.
Steve Hansen, Hansen & Associates (Consultant for Leslie Salt Co.)
Dale Bowyer, RWQCB
Mike Drennon, RWQCB

Introduction:

The goal of the meeting was to address the Regional Water Quality Control Board's comments stated in their letter of July 31st on the Bittern Option Selection and Study Plan and to discuss the next step needed to proceed with the proposal study plans.

Leslie Salt thought it would be worth while to step back and re-identify the goals for bittern discharge: To manage bittern to prevent future expansion of bittern storage into salt making ponds.

In this discussion Leslie Salt stated that we would probably need to keep Ponds 12 and 13 in bittern storage whether we were discharging or we were selling bittern. The reasons for this is bittern is produced in a "slug" when the salt is harvested. We need capacity and seasonal flexibility for discharge. If we were to sell the bittern, we would still need storage and surface area for further concentration of the bittern.

Regional Water Quality Control Board was concerned about any increase in storage such as Pond 11, and the amount of storage ultimately necessary. The Regional Board may not agree with Leslie Salt that Ponds 12 and 13 are necessary. It was decided to defer that decision until more information is available.

Another issue we decided to defer is the RWQCB position that the ponds, and bittern in the ponds constitute a waste discharge to "Waters of the State". Leslie Salt does not agree with either count, i.e., the ponds are "Waters of the State" and bittern storage constitutes waste disposal.

Response to the RWQCB Letter Dated July 31, 1989

After addressing the above issues we proceeded to discuss the RWQCB letter. The following points were addressed:

1. Concern over the selected option's capacity, specifically the ability to take more than the annual bittern production.

Conclusion: Leslie Salt and the Union Sanitary District will calculate what the available capacity is for option number 8 (Mix with USD post treated effluent to ultimate discharge to EBDA's deep water outfall). We will look at the capacity at different dilution ratios and incorporate any seasonal issues such as the reclaim water. This assessment will be done as soon as possible and may have an impact on the implementation of the study plan.

2. Concern over length of schedule.

Discussion: RWQCB suggested we shorten the proposed schedule. The schedule was proposed to include seasonal variability in the EBDA effluent and any variation in the bittern. The RWQCB said we may not need 12 months of variability and may be able to limit to two samples; in other words 6 months of study rather than the full 12 months or four samples as proposed.

Conclusion: Leslie Salt will consider ways of shortening the schedule including reducing the number of sampling events and sample numbers.

Other Issues:

- During the discussions, the RWQCB asked about the plans for Redwood City and Napa bittern. Leslie Salt explained we would try and use the Redwood City bittern for existing sales, in other words, Dust-Off sales. Napa, however, is a different project. Leslie Salt would like to first demonstrate the success with the Newark discharge and then evaluate the Napa bittern.
- Union Sanitary asked Leslie Salt if we had considered the Alameda County Water District pumping project as a source for dilution of the bittern. Leslie Salt will look into volumes of this effluent.

Conclusions:

- o RWQCB agreed Option #8 was the preferred option. RWQCB made the determination later in the day that the study plans for this option did not have to meet the USD effluent limits as the bittern would not be discharged at this location. The bittern effluent in EBDA outfall mix would have to meet the EBDA outfall limits.
- o Since suspended solids were identified as crystalline, they are not considered a problem as they would dissolve when diluted. Suspended solids should, however, be considered when pumping or discharging in the event they raise the salinity beyond the accepted dilution ratio.

Action Items:

- Once the volume issues with the discharge Option #8 are resolved, a revised study plan will be submitted and implemented.
- Union Sanitary District and Leslie Salt will meet with EBDA to discuss the discharge option.